



Federal Communications Commission
Washington, D.C. 20554

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Federal Communications Commission
Office of the Secretary

April 25, 2017

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Re: *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 and 03-123

Dear Ms. Dortch:

On March 23, 2017, the Federal Communications Commission (Commission) released a Further Notice of Proposed Rulemaking (FNPRM) that among other things proposes a new four-year compensation plan for video relay service (VRS).¹ In a Public Notice, the Consumer and Governmental Affairs Bureau announced it would place in the record of this rulemaking certain data referenced in the FNPRM and provided by Rolka Loube, LLC, the TRS Fund administrator, on each VRS provider's total allowable expenses, return on investment, minutes of service, and revenues for the years 2014-16 (VRS Provider Cost and Demand Data).² The Commission stated it would treat the VRS Provider Cost and Demand Data as Highly Confidential Information subject to the terms of the *Second Protective Order*.³ No objections were received regarding the Public Notice. Accordingly, a copy of the VRS Provider Cost and Demand Data is provided as an attachment to this letter, subject to the *Second Protective Order*.

Respectfully Submitted,

Eliot Greenwald
Deputy Chief, Disability Rights Office
Consumer and Governmental Affairs Bureau

¹ *Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Notice of Inquiry, Further Notice of Proposed Rulemaking and Order, 32 FCC Rcd 2436 (2017) (*VRS Improvements Order*).

² *Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Public Notice, DA 17-337 (2017).

³ *Id*; see also *Structure and Practices of the Video Relay Service Program, Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Second Protective Order, 27 FCC Rcd 5914 (2012).

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ATTACHMENT A
REDACTED FOR PUBLIC INSPECTION
HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO SECOND PROTECTIVE ORDER
IN CG DOCKET NOS. 03-123 AND 10-51 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

VRS Providers' Minutes, Revenues, and Expenses, 2014-16

	Total			Per-Minute		
	2014	2015	2016 (projected)	2014	2015	2016 (projected)
Sorenson	[***BEGIN HIGHLY CONFIDENTIAL SORENSON INFORMATION***]			[***BEGIN HIGHLY CONFIDENTIAL SORENSON INFORMATION***]		
Minutes						
Revenues						
Allowable Expenses						
Expenses plus 11.25% ROI						
Expenses plus 7.12% of expenses						
Expenses plus 9.75% of expenses						
	[***END SORENSON HIGHLY CONFIDENTIAL INFORMATION***]			[***END SORENSON HIGHLY CONFIDENTIAL INFORMATION***]		
Purple	[***BEGIN PURPLE HIGHLY CONFIDENTIAL INFORMATION***]			[***BEGIN PURPLE HIGHLY CONFIDENTIAL INFORMATION***]		
Minutes						
Revenues						
Allowable Expenses						
Expenses plus 11.25% ROI						
Expenses plus 7.12% of expenses						
Expenses plus 9.75% of expenses						
	[***END PURPLE HIGHLY CONFIDENTIAL INFORMATION***]			[***END PURPLE HIGHLY CONFIDENTIAL INFORMATION***]		
ZVRS	[***BEGIN ZVRS HIGHLY CONFIDENTIAL INFORMATION***]			[***BEGIN ZVRS HIGHLY CONFIDENTIAL INFORMATION***]		
Minutes						
Revenues						
Allowable Expenses						
Expenses plus 11.25% ROI						
Expenses plus 7.12% of expenses						
Expenses plus 9.75% of expenses						
	[***END ZVRS HIGHLY CONFIDENTIAL INFORMATION***]			[***END ZVRS HIGHLY CONFIDENTIAL INFORMATION***]		
Convo	[***BEGIN CONVO HIGHLY CONFIDENTIAL INFORMATION***]			[***BEGIN CONVO HIGHLY CONFIDENTIAL INFORMATION***]		
Minutes						
Revenues						
Allowable Expenses						
Expenses plus 11.25% ROI						
Expenses plus 7.12% of expenses						
Expenses plus 9.75% of expenses						
	[***END CONVO HIGHLY CONFIDENTIAL INFORMATION***]			[***END CONVO HIGHLY CONFIDENTIAL INFORMATION***]		
Global	[***BEGIN GLOBAL HIGHLY CONFIDENTIAL INFORMATION***]			[***BEGIN GLOBAL HIGHLY CONFIDENTIAL INFORMATION***]		
Minutes						
Revenues						
Allowable Expenses						
Expenses plus 11.25% ROI						
Expenses plus 7.12% of expenses						
Expenses plus 9.75% of expenses						
	[***END GLOBAL HIGHLY CONFIDENTIAL INFORMATION***]			[***END GLOBAL HIGHLY CONFIDENTIAL INFORMATION***]		
Total Industry						
Minutes	125,084,845	127,873,647	133,493,196			
Revenues	\$593,514,927	\$563,069,736	\$547,989,594	\$4.74	\$4.40	\$4.11
Allowable Expenses	\$341,796,072	\$336,256,533	\$359,472,813	\$2.73	\$2.63	\$2.69
Expenses plus 11.25% ROI	\$347,249,081	\$354,285,359	\$364,539,529	\$2.78	\$2.77	\$2.73
Expenses plus 7.12% of expenses	\$366,131,953	\$360,197,998	\$385,067,277	\$2.93	\$2.82	\$2.88
Expenses plus 9.75% of expenses	\$375,121,189	\$369,041,545	\$394,521,412	\$3.00	\$2.89	\$2.96

NOTE: Actual and projected minutes and expenses are as reported by each provider to Rolka Loube in their annual filings in February 2016. Revenues are calculated based on applicable compensation rates multiplied by the monthly minutes reported for each tier.